

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

Criminal No. 6:20-cr-00628-TMC

vs.

MATTHEW J. WARD,
a/k/a "Bones"
REBECCA MARTINEZ
CYNTHIA ROOKS
RICHARD FORD
AMBER HOFFMAN
SAMUEL DEXTER JUDY
BRIAN BRUCE
MONTANA BAREFOOT
JOHN JOHNSON
KELLY STILL
BENJAMIN SINGLETON
KAYLA MATTONI
ALECIA YOUNGBLOOD
CLIFFORD KYZER
KELLY JORDAN
MARK EDWARD SLUSHER
ROBERT FIGUEROA
TIFFANIE BROOKS
CRYSTAL NICOLE BRIGHT
BRITTNEY SHAE STEPHENS
ARIAN GRACE JEANE
LISA MARIE COSTELLO
AARON COREY SPROUSE
MATTHEW EDWARD CLARK
JAMES ROBERT PETERSON,
a/k/a "Man Man"
EDWARD GARY AKRIDGE,
a/k/a "G9," a/k/a "G9 the Don,"
a/k/a "Eddie Boss"
AARON MICHAEL CARRION,
a/k/a "Cap G"
HEATHER HENDERSON ORRICK
VIRGINIA RUTH RYALL
LISA MARIE BOLTON
CATHERINE AMANDA ROSS

18 U.S.C. § 2
18 U.S.C. § 3
18 U.S.C. § 36
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(d)(1)
18 U.S.C. § 924(e)
18 U.S.C. § 924(j)
18 U.S.C. § 1201
18 U.S.C. § 1512
18 U.S.C. § 1951
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 1956(a)(1)(A)(i)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1956(h)
18 U.S.C. § 982(a)(1)
18 U.S.C. § 1959(a)(1)
18 U.S.C. § 1959(a)(3)
18 U.S.C. § 1959(a)(6)
18 U.S.C. § 1962(d)
18 U.S.C. § 1963(a)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 844(a)
21 U.S.C. § 846
21 U.S.C. § 853
21 U.S.C. § 856(a)(1)
21 U.S.C. § 856(b)
21 U.S.C. § 881
28 U.S.C. § 2461(c)

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SUPERSEDING INDICTMENT

BRANDON LEE PHILLIPS,
a/k/a “Lil B”
BILLY WAYNE RUPPE
WINDY BROOKE GEORGE
JUAN RODRIGUEZ,
a/k/a “Fat Boy”
JONATHAN EUGENE MERCHANT,
a/k/a “Merck”
JOSHUA LEE SCOTT BROWN
JENNIFER SORGEE
ALEX BLAKE PAYNE
SALLY WILLIAMS BURGESS,
a/k/a “Cricket”

COUNT 1
(RICO Conspiracy)

Background

At all times relevant to this Superseding Indictment:

1. The Insane Gangster Disciples (“IGD”) is a branch of the Folk Nation, a violent gang founded in the 1970s in Chicago by Larry Hoover and David Barksdale, when, as leaders of two different Chicago-based gangs, the Supreme Gangsters and the Black Disciples, they aligned their respective groups. The Folk Nation is comprised of several different gangs, including, among others, the Gangster Disciples and IGD. IGD operates inside and outside of prisons and jails in South Carolina and elsewhere, and IGD members and associates frequently traffic illegal drugs and commit violent acts. Unlike many Folk Nation-aligned gangs, IGD is comprised predominately of Caucasians.
2. The IGD maintain a highly structured organization. Members are organized into “counts.” Members in good standing are said to be “on count,” “righteous,” or “plugged in.” A meeting of a particular count may be referred to as an “E7,” “nine,” or “conference.” During these meetings, dues may be collected, gang membership and business discussed, gang literature distributed, and criminal activity discussed and planned.

3. IGD members often use titles for positions within the gang. “Board Members” are among the highest-ranking gang members. The “Governor-of-Governors,” “Governors,” “Regents,” and “Institutional Coordinators” control geographical areas and the prisons. The position of “Enforcer” is responsible for enforcing the gang’s codes, rules, and regulations.

4. Male IGD members are referred to as “Brothers of the Struggle” (“BOS”). The “Sisters of the Struggle” (“SOS”) are female IGD members. IGD members of both genders refer to IGD associates as “FOF,” or “Friends of Folk.”

5. IGD members use specific words or codes to communicate with one another. Some commonly used words include:

- a. “818,” a higher-ranking IGD member where “8” refers to the letter “H” and “18” refers to the letter “R.”
- b. “POA,” a Position of Authority.
- c. “Nation,” referring to the gang as a whole.
- d. “415,” a direct order where “4” refers to the letter “D” and “15” refers to the letter “O.”
- e. “606,” stands for “Friends of Folk,” who are individuals associated with IGD.
- f. The “16s,” the sixteen IGD rules, which, if violated, result in punishment.
- g. “6 for 6,” the initiation process where a prospective IGD member must fight six other gang members for a specific period of time.
- h. “A and A” or “aid and assistance,” the rule that one IGD member must help another IGD member, including in illegal activity.
- i. “Honey pot,” money collected from IGD members used to bond IGD members out of jail, purchase firearms, and other gang business.

The Enterprise

6. At all times relevant to this Count of this Superseding Indictment, there existed in the District of South Carolina, and elsewhere, an organization, namely, the Insane Gangster Disciples (defined above as “IGD”). IGD, including its leaders, members, and associates, constituted an enterprise, as defined by Title 18, United States Code, Sections 1961(4) and 1959(b)(2)—that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

7. The purposes of the enterprise included, but were not limited to, the following:
- a. Enriching the leaders, members, and associates of the enterprise through, among other things, drug trafficking, kidnapping, extortion, firearms trafficking, money laundering, and moving contraband, including drugs and cell phones, into prisons and jails.
 - b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, and violence, including, but not limited to, acts involving murder, kidnapping, assault with a dangerous weapon, obstruction of justice, and other acts of violence.
 - c. Keeping victims and witnesses of crimes in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence, including acts involving murder, assault, and intimidation.
 - d. Providing gang members safe houses in which to hide to avoid apprehension by police.

- e. Providing financial aid and assistance to gang members charged with or incarcerated for gang-related activities, including, but not limited to, posting bond.

The Racketeering Conspiracy

8. That beginning at a time unknown to the grand jury, but starting no later than the year 2017 and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina and elsewhere, the Defendants,

MATTHEW J. WARD, a/k/a “Bones”;
CYNTHIA ROOKS;
AMBER HOFFMAN;
CLIFFORD KYZER;
CRYSTAL NICOLE BRIGHT;
ARIAN GRACE JEANE;
LISA MARIE COSTELLO;
AARON COREY SPROUSE;
JAMES ROBERT PETERSON, a/k/a “Man Man”;
EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss”;
AARON MICHAEL CARRION, a/k/a “Cap G”;
HEATHER HENDERSON ORRICK;
VIRGINIA RUTH RYALL;
LISA MARIE BOLTON;
JENNIFER SORGEE;
ALEX BLAKE PAYNE;
SALLY WILLIAMS BURGESS, a/k/a “Cricket”; and

others known and unknown to the grand jury, being persons employed by and associated with IGD, an enterprise engaged in, and the activities of which affect, interstate and foreign commerce, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with one another to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly in the conduct of IGD’s affairs through a pattern of racketeering activity, as defined by Title 18, United States Code, Sections 1961(1) and 1961(5), which consisted of multiple threats and acts involving:

- a. murder, in violation of South Carolina Code of Laws, Sections 16-3-10, 16-3-29, and 16-17-410;

- b. robbery, in violation of South Carolina Code of Laws, Sections 16-11-330, 16-17-410, and 16-11-325;
- c. arson, in violation of South Carolina Code of Laws, Sections 16-11-110(C), 16-17-410, and 16-1-80;
- d. kidnapping, in violation of South Carolina Code of Laws, Sections 16-3-910, 16-3-920, and 16-1-80;

multiple offenses involving

- e. drug trafficking, in violation of Title 21, United States Code, Sections 841 and 846;
- and

multiple acts indictable under

- f. Title 18, United States Code, Section 1956 (relating to the laundering of monetary instruments);
- g. Title 18, United States Code, Sections 1512 (relating to tampering with a witness, victim, or an informant) and 1513 (relating to retaliating against a witness, victim, or an informant); and
- h. Title 18, United States Code, Section 894 (relating to extortionate credit transactions).

It was part of the conspiracy that each Defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

9. For the purposes of this count, the charged Defendants are only those individuals whose names are listed in all capital letters.

Manner and Means of the Conspiracy

10. The manner and means by which the members and associates conducted and participated in the conduct of the affairs of the IGD criminal enterprise to achieve its purposes included, but were not limited to, the following:

- a. The members and associates of the enterprise attended regular meetings where criminal activity and gang finances were discussed and disciplinary beatings of fellow IGD members were discussed and decided.
- b. To enforce discipline and the rules of the enterprise, members and associates of the enterprise engaged in a system of “violations,” in which the Defendants and others committed and aided and abetted in the commission of acts involving murder, kidnapping, assault and threats, and the imposition of fines and written essays for those members and associates of the enterprise who violated rules, questioned authority, were suspected of cooperating with law enforcement, and otherwise posed any real or perceived threat to the leaders, members, and purposes of the enterprise.
- c. To generate income, the Defendants distributed and agreed to distribute and possess with intent to distribute methamphetamine and heroin; and committed, agreed to commit, and attempted to commit robbery, extortion, arson, money laundering, firearms trafficking, and other illegal activities.
- d. IGD members taught other members and associates how to commit certain crimes, including drug trafficking and money laundering.
- e. IGD members acquired, stored, borrowed, transferred, carried, and used firearms and other weapons to engage in attacks and armed conflict with others.

- f. Members and associates of the enterprise used gang-related terminology, codes, symbols, phrases, and hand gestures to demonstrate affiliation with the gang.
- g. To perpetuate the enterprise and to maintain and extend its power, members and associates of the enterprise committed, attempted to commit, and conspired to commit acts including murder, intimidation, extortion, money laundering, and assaults against individuals who posed a threat to the enterprise and jeopardized its operations, including IGD members who were believed to not be following gang rules and other individuals such as witnesses to the enterprise's illegal activities.
- h. Members and associates of the enterprise hid, misrepresented, concealed, and caused to be hidden, misrepresented, and concealed the objectives of acts done in furtherance of the enterprise and used coded language and other means of communication to avoid detection and apprehension by law enforcement.
- i. To avoid detection by law enforcement and create confusion amongst potential witnesses, IGD members deliberately employed specialized methods of drug distribution such as "dead drops" to avoid face-to-face transactions and tasked gang members from one geographical area to travel to another geographical area to commit violent acts and other activities associated with drug distribution, including debt collection.
- j. Incarcerated IGD members communicated and coordinated with non-incarcerated IGD members and associates to traffic drugs, smuggle contraband into prisons, and commit violent acts and other acts of intimidation to further the purposes of the enterprise.

Overt Acts

In furtherance of the conspiracy, and to effect the object and purposes thereof, the Defendants, and others not named as Defendants herein, committed various overt acts, including, but not limited to, the following:

1. On a date uncertain but no later than March 1, 2017, while imprisoned in the South Carolina Department of Corrections (“SCDC”), a Folk Nation member distributed synthetic marijuana to Kendrick Hoover.
2. Thereafter, Folk Nation member “Big Jim” approved an attack on Hoover.
3. On or about March 1, 2017, while in prison, Defendant **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,”** stabbed and killed Hoover with a shank or makeshift knife.
4. On or after March 1, 2017, **AKRIDGE** and other IGD associates threatened B.C. and his family, warning them not to cooperate with police regarding **AKRIDGE**’s involvement in the Hoover killing.
5. On or after March 1, 2017, **AKRIDGE** and other IGD associates offered \$5,000 to P.G. to change P.G.’s statement to police, which had implicated **AKRIDGE** in the Hoover killing.
6. No later than the summer of 2017, **AKRIDGE** agreed to purchase large-scale quantities of methamphetamine from N.R., a fellow inmate who had connections to a Mexican drug cartel.
7. No later than the summer of 2017, as a result of the drug partnership between **AKRIDGE** and N.R., **AKRIDGE** gained status and rank within IGD and used IGD members inside and outside of prison to distribute drugs.

8. No later than the summer of 2017, Defendant **JAMES ROBERT PETERSON**, a/k/a “**Man Man**,” who was incarcerated in SCDC, started talking to Defendant **LISA MARIE COSTELLO** using a contraband cell phone in prison and directed **COSTELLO** to collect drug money owed to **PETERSON**.
9. **PETERSON** directed **COSTELLO** to direct some of the money to **PETERSON** using Green Dot, PayPal, and other cash transferring systems.
10. Throughout the time that **COSTELLO** collected money and distributed drugs for **PETERSON**, **PETERSON** threatened **COSTELLO** and her family members with bodily harm.
11. Beginning in or around March 2018, **PETERSON** directed **COSTELLO** to pick up between two and four kilograms of methamphetamine at a time from various locations and bring it to C.P.’s house, who was also working for **PETERSON**.
12. C.P. and D.W., also working for **PETERSON**, consolidated drug proceeds for payment to the drug suppliers.
13. In or around February 2019, **PETERSON** rented a residence at 155 Brights Road, Gaffney, South Carolina, where **COSTELLO** stored and distributed methamphetamine from that location.
14. In or around February 2019 through July 25, 2019, **COSTELLO** obtained methamphetamine from various sources on **PETERSON**’s behalf and repackaged it according to **PETERSON**’s instructions.
15. In or around February 2019 through July 25, 2019, **COSTELLO** regularly placed methamphetamine in a clothes dryer located behind the 155 Brights Road residence, where the drugs would be picked up by buyers who would put payment for the drugs in the dryer.

16. In or around February 2019 through July 25, 2019, **COSTELLO** took photographs of the money left in the dryer and sent them to **PETERSON**, who was still incarcerated, as proof of the transactions.
17. In or around February 2019 through July 25, 2019, C.P., D.W., and others picked up drug proceeds from 155 Brights Road, Gaffney, South Carolina on **PETERSON**'s behalf.
18. On a date uncertain but no later than in or around February 2019, Defendant **MATTHEW J. WARD, a/k/a "Bones,"** partnered with **AKRIDGE** to distribute methamphetamine.
19. During this time, **WARD** partnered with Defendant **CLIFFORD KYZER**, Defendant **CYNTHIA ROOKS**, and others around the Lexington, South Carolina, area to distribute methamphetamine.
20. On or about March 6, 2019, after leaving **KYZER**'s residence, Kelly Jordan possessed two kilograms of methamphetamine and two handguns.
21. On or about March 6, 2019, **KYZER** had approximately 400 grams of methamphetamine, eight firearms, various ammunition, and body armor in his house.
22. In or about April 2019, **WARD** sent **KYZER**, who was armed, to Brian Bruce's residence to collect a drug debt.
23. In or about May 2019, **PETERSON** sent Defendant **AARON MICHAEL CARRION, a/k/a "Cap G,"** to repossess money and drugs at gunpoint from Defendant **AARON COREY SPROUSE** and J.B. because **PETERSON** believed **SPROUSE** and J.B. had diluted his methamphetamine without permission.

24. After **CARRION** repossessed the drugs from **SPROUSE** and J.B., **PETERSON** impressed by how **SPROUSE** had conducted himself, began using **SPROUSE** as a major distributor of his drugs.
25. On or about June 27, 2019, **PETERSON** ordered **SPROUSE** to kidnap G.J.L.
26. On or about May 23, 2019, IGD associates Robert Figueroa and Tiffanie Brooks possessed heroin, fentanyl, two kilograms of methamphetamine, three firearms, various ammunition, and drug paraphernalia.
27. On or about May 31, 2019, at **WARD**'s direction, **CARRION** and Defendant **AMBER HOFFMAN** drove by Mark Slusher's house at 200 Shirway Court, Lexington, South Carolina, and discharged firearms at the house while other people were outside.
28. On or about June 4, 2019, **CARRION**, **HOFFMAN**, and one other individual confronted C.W. at gunpoint over a drug debt that C.W. owed **WARD**.
29. On a date uncertain but no later than June 11, 2019, Defendant **SALLY WILLIAMS BURGESS, a/k/a "Cricket,"** distributed methamphetamine at the direction of IGD member D.W., an inmate at SCDC, and transferred money using Green Dot cards on behalf of several IGD members.
30. On or about June 11, 2019, **BURGESS** had two handguns, ammunition, approximately 278 grams of methamphetamine, and multiple Green Dot cards.
31. On a date uncertain but no later than February 9, 2020, at the direction of IGD member and SCDC inmate D.W., **BURGESS** robbed a Hispanic female at gunpoint for five kilograms of methamphetamine at a trailer in Gaffney, South Carolina.
32. On or about June 13, 2019, **WARD** and Brian Bruce sold approximately 80 grams of methamphetamine.

33. On or about June 13, 2019, **WARD, HOFFMAN**, and R.W. sold approximately 54 grams of methamphetamine.
34. On or about June 14, 2019, Defendant **JENNIFER SORGEE** possessed at least 500 grams of methamphetamine, multiple firearms, and drug paraphernalia.
35. On or about June 26, 2019, **HOFFMAN** possessed methamphetamine and a handgun.
36. After **HOFFMAN**'s June 26, 2019 arrest, **WARD** arranged for Z.G. to bond **HOFFMAN** out of jail in exchange for heroin and a gun.
37. After Z.G. bonded **HOFFMAN** out of jail, **HOFFMAN** took Z.G. to John Johnson's house, where Johnson provided the heroin that **WARD** promised.
38. **HOFFMAN** then took Z.G. to Samuel Dexter Judy's house, where Judy provided the gun that **WARD** promised.
39. On or about July 2, 2019, Johnson possessed multiple firearms, including a sawed-off shotgun.
40. On a date uncertain but no later than July 7, 2019, on orders from **PETERSON, CARRION** beat J.G., Windy Brooke George's boyfriend, when **CARRION** went to collect a drug debt George owed.
41. On or about July 7, 2019, Windy Brooke George possessed approximately two kilograms of methamphetamine and a firearm.
42. On or about July 9, 2019, **CARRION** led police on a high-speed chase and possessed a firearm.
43. On or about July 11 through July 14, 2019, **AKRIDGE, WARD, PETERSON**, Defendant **HEATHER HENDERSON ORRICK**, and others arranged for **COSTELLO** to bond **CARRION** out of jail following a police chase that resulted in his arrest.

44. On or about July 14, 2019, **ORRICK**, driving a rented black Mazda car, picked **CARRION** up from jail.
45. On or about July 15, 2019, **CARRION** and **ORRICK** shot W.H. after W.H. took money belonging to IGD.
46. On or about July 17, 2019, **PETERSON**, sent **CARRION**, who was armed and wearing body armor, to threaten C.W. for diluting **PETERSON**'s drugs.
47. On or about July 17, 2019, **CARRION** told **COSTELLO** that she would never have to worry about him being a "serial killer" as long as she handled **PETERSON**'s money properly.
48. On or about July 19, 2019, **CARRION**, Judy, and Johnson fired shots at R.W.'s vehicle at **WARD**'s direction.
49. Just after midnight during the early morning hours of July 20, 2019, **CARRION** and J.H. beat, pistol-whipped, and shot at Brian Bruce at **WARD**'s direction.
50. During the early morning hours of July 20, 2019, Defendants **VIRGINIA RUTH RYALL** and **LISA MARIE BOLTON** traveled to Cherokee County, South Carolina, in a stolen truck to buy one ounce of methamphetamine from **SPROUSE**.
51. While **SPROUSE** was conducting the drug transaction with **RYALL** and **BOLTON**, **PETERSON** using a contraband phone from SCDC, called **SPROUSE** and told him an "informant" was on her way to **COSTELLO**'s residence at 155 Brights Road, Gaffney, South Carolina, to buy drugs and instructed **SPROUSE** to abduct the "informant," later identified as Michelle Dodge, take her to a secure location, and hold her for the "out-of-town enforcer."
52. **PETERSON** then gave instructions to **SPROUSE** over speakerphone on how to conduct the kidnapping of the alleged informant.

53. After receiving **PETERSON**'s call, **SPROUSE**, **RYALL**, **BOLTON**, and Catherine Amanda Ross traveled in the stolen truck to 155 Brights Road.
54. When **SPROUSE**, **RYALL**, **BOLTON**, and Ross arrived at 155 Brights Road, **SPROUSE** and Ross exited the truck and awaited Dodge's arrival, while **RYALL** and **BOLTON** hid inside the truck.
55. When Brandon Lee Phillips, a/k/a "Lil B," arrived at 155 Brights Road with the intended kidnapping victim, Michelle Dodge, in Dodge's vehicle, they exited the vehicle and walked towards the back of the residence where **SPROUSE** struck Dodge with a firearm before loading her in the stolen truck.
56. **COSTELLO**, who witnessed Dodge's kidnapping, spoke with **PETERSON** over the phone multiple times, and **PETERSON** threatened **COSTELLO** not to call the police.
57. **PETERSON** also instructed Phillips to remove Dodge's car from the scene, but Phillips refused and ran away.
58. **SPROUSE**, **RYALL**, **BOLTON**, and Ross then drove Dodge to an abandoned property at 372 Old Factory Road, Blacksburg, South Carolina.
59. While at 372 Old Factory Road, **RYALL** searched Dodge before **SPROUSE** and **RYALL** tied Dodge to a chair, waterboarded her, and shot her in the foot while accusing her of being an informant.
60. During this time, **SPROUSE** sent **PETERSON** the 372 Old Factory Road location, and **PETERSON** sent **SPROUSE** updates regarding the out-of-town enforcer's arrival.
61. Later that morning, the out-of-town enforcer, **CARRION**, arrived at 372 Old Factory Road.

62. **SPROUSE** and **CARRION** placed Dodge, still bound, in the trunk of the rented black Mazda car that **CARRION** was driving.
63. **CARRION** then drove **SPROUSE** and Dodge to the area of 903 McDaniel Road, Laurens, South Carolina.
64. During the transport to 903 McDaniel Road, Dodge twice unsuccessfully attempted to escape from the trunk of the car, causing **SPROUSE** to place her in the backseat while **CARRION** held her at gunpoint.
65. When they arrived at 903 McDaniel Road, **CARRION** ordered Dodge out of the car, walked her towards the wood line, and shot her in the back of the head, killing her.
66. While Dodge was being held at 372 Old Factory Road, **BOLTON** and Ross left that location and brought Dodge's car keys to **COSTELLO** at 155 Brights Road, where Dodge's car was still parked.
67. At **PETERSON**'s instruction, Billy Wayne Ruppe drove to 155 Brights Road, took possession of Dodge's vehicle, and abandoned it at the Dollar General store located at 1795 Wilkinsville Highway, Gaffney, South Carolina.
68. At **PETERSON**'s instruction, Ruppe later returned to wipe down Dodge's vehicle and remove items from it.
69. After Dodge was shot and killed, **CARRION** and **SPROUSE** stopped at the Trader's Gun Store at 2850 Wade Hampton Boulevard, Taylors, South Carolina, to purchase ammunition.
70. **CARRION** and **SPROUSE** then drove to **ORRICK**'s residence, 528 Copeland Drive, Greer, South Carolina, where **ORRICK**, **CARRION**, and **SPROUSE** cleaned the black Mazda car used to abduct and transport Dodge.

71. On or about July 26, 2019, **CARRION** told Defendant **CRYSTAL NICOLE BRIGHT** that he needed to dispose of the black Mazda.
72. On or about July 28, 2019, the black Mazda was found burned in Cayce, South Carolina.
73. On or about July 31, 2019, **CARRION** fled from police with approximately 187 grams of methamphetamine, a firearm with an obliterated serial number, and ammunition in his car.
74. On or about June 24, 2019, **ROOKS** rented a storage unit to store **WARD**'s guns and drugs.
75. On or about July 19, 22, and 24, 2019, **WARD** distributed over 100 grams of methamphetamine through Rebecca Martinez.
76. On a date uncertain but no later than August 2019, **CARRION** connected **BRIGHT** to **WARD**, whom **CARRION** called his "Big Homie."
77. Thereafter, **WARD** introduced **BRIGHT** to **ROOKS** for the purpose of distributing methamphetamine.
78. On or about August 5, 2019, **WARD** directed Z.G. to go to **ROOKS**'s house to buy approximately 11 ounces of methamphetamine.
79. On or about August 5, 2019, **WARD** warned Z.G., who had brought another person with him to **ROOKS**'s house, against bringing an outsider over again—saying, "Don't ever bring anyone back to my spot."
80. On or about August 14, 2019, Brittney Shae Stephens rented a storage unit for **AKRIDGE** in Greenville, South Carolina.
81. On or about August 19, 2019, **WARD**, **ROOKS**, and Richard Ford sold a rifle and two ounces of methamphetamine.

82. On or about August 22, 2019, Judy, who had previously been on a drug run and went by **ROOKS**'s storage unit, led police on a high-speed chase and threw a firearm out of the window.
83. On or about August 22-23, 2019, **WARD**, **ROOKS**, Judy, and Ford possessed approximately four kilograms of methamphetamine, nine guns (including a machine gun), and various rounds of ammunition.
84. After police seized methamphetamine and firearms belonging to **WARD** on August 22-23, 2019, **BRIGHT** began distributing drugs for **AKRIDGE**.
85. On a date uncertain but no later than August 23, 2019, **ROOKS** possessed money transfer cards which she used to transfer drug proceeds to IGD members.
86. On or about August 23, 2019, **WARD** possessed a contraband cell phone in SCDC.
87. On or about August 28, 2019, Judy possessed a stolen car, a revolver, and three ounces of methamphetamine.
88. On or about September 4, 2019, **AKRIDGE** and Stephens possessed approximately 21.5 kilograms of methamphetamine and three firearms.
89. Prior to September 4, 2019, M.M. placed a gun in Stephens's storage unit on behalf of **AKRIDGE**, who was still incarcerated.
90. After September 4, 2019, **AKRIDGE** threatened to kill Stephens and her family after law enforcement seized the methamphetamine and firearms.
91. After police seized **AKRIDGE**'s methamphetamine and firearms, Defendant **ARIAN GRACE JEANE** began receiving direct orders from **AKRIDGE** about picking up and dropping off drugs and money, including making trips to Georgia to pick up methamphetamine.

92. On or about September 19, 2019, **AKRIDGE** had a cell phone, cell phone charger, and a shank or makeshift knife in prison.
93. On or about November 19, 2019, **AKRIDGE** posted a photograph of himself on social media from SCDC with an actual knife, a digital scale, and suspected methamphetamine.
94. On or about November 20, 2019, Johnson and Kelly Still possessed heroin, marijuana, more than 1.5 kilograms of methamphetamine, a firearm, and various rounds of ammunition.
95. On or about December 27, 2019, **AKRIDGE** ordered T.M. to shoot Joshua Lee Scott Brown, and afterwards **AKRIDGE** threatened to “X” T.M. out of the gang when T.M. refused to follow his order.
96. On or about the first week of January 2020, **JEANE** collected approximately \$11,000 of drug proceeds that belonged to **AKRIDGE**.
97. Thereafter, when a significant amount of **AKRIDGE**’s drug proceeds were stolen from **JEANE** at 1935 Old Grove Road, Piedmont, South Carolina, **AKRIDGE** held **JEANE** responsible for the drug debt.
98. Between January 20-22, 2020, to extinguish the debt, **AKRIDGE** ordered **JEANE** to do two things: 1) drive Jonathan Eugene Merchant, a/k/a “Merck,” to 1935 Old Grove Road, the location where **AKRIDGE**’s drug proceeds were stolen from **JEANE**; and 2) drive Brown to a location where other IGD members could “mash Josh out” (or physically beat him).
99. On or about January 22, 2020, **JEANE** drove Brown and Merchant to 1935 Old Grove Road, where Brown and Merchant fired multiple shots into the residence, killing Jeffrey Mitchell Snipes.

100. On or about February 4, 2020, **JEANE** possessed approximately two kilograms of methamphetamine.
101. From on or about August 23, 2019, until March 30, 2020, **BRIGHT** regularly distributed at least one kilogram of methamphetamine per week for **AKRIDGE**.
102. On or about February 9, 2020, **BURGESS** possessed approximately 64 grams of methamphetamine, 10 grams of heroin, and a firearm.
103. On or about March 8, 2020, Facebook user “Shawn Lee” identified himself to **AKRIDGE** as the “Gov of Govs for the Insanes” and instructed **AKRIDGE** to report the names of all IGD members in good standing, which **AKRIDGE** did.
104. On or about March 30, 2020, **BRIGHT** possessed approximately 100 grams of methamphetamine that she obtained from **AKRIDGE**.
105. On or before April 1, 2020, R.C. and H.C., followed in a separate car by **SORGEE**, traveled to Atlanta, Georgia, with IGD money to buy drugs for **AKRIDGE**.
106. On or about April 2, 2020, **SORGEE** repeatedly attempted to find R.C. and H.C. after the two left Atlanta, drove to Greenville, and kept **AKRIDGE**’s money for themselves instead of buying the drugs.
107. On or about April 3, 2020, **AKRIDGE**, on a contraband cell phone from SCDC, instructed **BRIGHT** and Defendant **ALEX BLAKE PAYNE** to travel from Lexington, South Carolina, to Greenville, South Carolina, to confront R.C. and obtain **AKRIDGE**’s stolen drug money.
108. Upon arriving in Greenville on or about April 3, 2020, at **AKRIDGE**’s instruction, **BRIGHT** and **PAYNE** went to the Berkley Pointe Apartments off Wenwood Road in Greenville, South Carolina, to find R.C.

109. After **BRIGHT** and **PAYNE** were unable to locate R.C., **AKRIDGE** instructed them to drive to **SORGEE**'s residence to discuss a plan of action.
110. On or about April 3, 2020, **AKRIDGE** and C.C., both using contraband cell phones from inside SCDC, directed **SORGEE** to show **BRIGHT** and **PAYNE** where R.C.'s parents lived.
111. After **SORGEE** led **BRIGHT** and **PAYNE** to R.C.'s parents' home in Travelers Rest, South Carolina, **PAYNE** fired multiple shots into the house using a .45 caliber pistol.
112. After R.C. retaliated for the shooting of his parents' house by shooting at **SORGEE**'s residence, **AKRIDGE** and C.C. arranged for **PAYNE** to obtain a .308 caliber rifle.
113. Before **PAYNE** and **BRIGHT** drove back to Lexington, **AKRIDGE** told **SORGEE** to pay **PAYNE** in methamphetamine and cash for his efforts, which she did.
114. On or about April 5, 2020, **AKRIDGE** referred to **PETERSON** as his "brother" and said they are on the "same level" within IGD.
115. On or about May 20, 2020, **AKRIDGE** announced in an IGD leadership meeting that he wanted A.G. killed.
116. On or about June 10, 2020, and continuing thereafter, **ORRICK** attempted to corruptly persuade and provide misleading information to D.R. regarding Dodge's kidnapping and murder.
117. On or about September 11, 2020, **AKRIDGE** had eight cellphones, two phone chargers, and two shanks inside his prison cell.

Notice of Enhanced Sentencing

11. As part of their agreement to conduct and participate in the conduct of the affairs of the IGD enterprise through a pattern of racketeering activity, the following Defendants agreed that

acts of murder would be committed in violation of South Carolina Code of Laws, Section 16-3-10, to wit, the killing of any person with malice aforethought, either express or implied:

MATTHEW J. WARD, a/k/a “Bones”;
ARIAN GRACE JEANE;
AARON COREY SPROUSE;
JAMES ROBERT PETERSON, a/k/a “Man Man”;
EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss”;
AARON MICHAEL CARRION, a/k/a “Cap G”;
HEATHER HENDERSON ORRICK;
VIRGINIA RUTH RYALL;
LISA MARIE BOLTON; and
ALEX BLAKE PAYNE.

12. As part of their agreement to conduct and participate in conduct of the affairs of the IGD enterprise through a pattern of racketeering activity, the following Defendants agreed that offenses involving drug trafficking would be committed, that is, knowingly and intentionally possessing with intent to distribute, distributing, and conspiring to do the same, at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841, 841(b)(1)(A), and 846:

MATTHEW J. WARD, a/k/a “Bones”;
CYNTHIA ROOKS;
AMBER HOFFMAN;
CLIFFORD KYZER;
CRYSTAL NICOLE BRIGHT;
ARIAN GRACE JEANE;
LISA MARIE COSTELLO;
AARON COREY SPROUSE;
JAMES ROBERT PETERSON, a/k/a “Man Man”;
EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss”;
AARON MICHAEL CARRION, a/k/a “Cap G”;
HEATHER HENDERSON ORRICK;
JENNIFER SORGEE; and
SALLY WILLIAMS BURGESS, a/k/a “Cricket”;

All in violation of Title 18, United States Code, Sections 1962(d) and 1963(a).

VIOLENT CRIME AND FIREARMS COUNTS

COUNT 2

(Violent crime in aid of racketeering – Murder)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

On or about March 1, 2017, in the District of South Carolina, the Defendant, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,”** did murder Kendrick Hoover, in violation of South Carolina Code of Laws, Section 16-3-10, for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity.

All in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT 3

(Violent crime in aid of racketeering – Assault with a dangerous weapon)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery, in violation of the laws of South Carolina; offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments), 1512 (relating to tampering with a witness, victim, or an informant), and 894 (relating to extortionate credit transactions).

On or about July 20, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** did assault Brian Bruce with a dangerous weapon, in violation of South Carolina Code of Laws, Section 16-3-600(D)(1)(a), for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity.

All in violation of Title 18, United States Code, Section 1959(a)(3).

COUNT 4

(Discharging a firearm during a crime of violence)

THE GRAND JURY FURTHER CHARGES:

On or about July 20, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** did knowingly carry and use and discharge a firearm during and in relation to a crime of violence, as charged in Count 3, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT 5

(Violent crime in aid of racketeering – Kidnapping)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery, in violation of the laws of South Carolina; offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments), 1512 (relating to tampering with a witness, victim, or an informant), and 894 (relating to extortionate credit transactions).

On or about July 20, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE**, did knowingly and unlawfully kidnap Michelle Dodge, in violation of South Carolina Code of Laws, Section 16-3-910, for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 6

(Kidnapping resulting in death)

THE GRAND JURY FURTHER CHARGES:

That on or about July 20, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,” AARON COREY SPROUSE, CATHERINE AMANDA ROSS, VIRGINIA RUTH RYALL,** and **LISA MARIE BOLTON**, did unlawfully and willfully seize, confine, kidnap, abduct, carry away, and hold Michelle Dodge, and in committing and in furtherance of the commission of the offense, did use cell phones, which are a means, facility, and instrumentality of interstate commerce, which resulted in the death of Michelle Dodge, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT 7

(Violent crime in aid of racketeering – Murder)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery, in violation of the laws of South Carolina; offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments), 1512 (relating to tampering with a witness, victim, or an informant), and 894 (relating to extortionate credit transactions).

On or about July 20, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE**, did murder Michelle Dodge, in violation of South Carolina Code of Law, Section 16-3-10, for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 8

(Murder committed through the use of a firearm during and in relation to a crime of violence)

THE GRAND JURY FURTHER CHARGES:

On or about July 20, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE**, in the course of a violation of Title 18, United States Code, Section 924(c), to wit, the knowing and intentional carrying, use, and discharge of a firearm during and in relation to a crime of violence, as charged in Count 7, which is prosecutable in a court of the United States, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), in that the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE**, with malice aforethought, did unlawfully kill Michelle Dodge willfully, deliberately, maliciously, and with premeditation, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 924(c), 924(j)(1), and 2.

COUNT 9

(Accessory after the fact – kidnapping resulting in death)

THE GRAND JURY FURTHER CHARGES:

That on or about July 20, 2019, through on or about July 26, 2019, in the District of South Carolina, the Defendant, **HEATHER HENDERSON ORRICK**, knowing that an offense against the United States had been committed, to wit, the offenses alleged in Counts 5–8, did receive, relieve, comfort, and assist the offenders, in order to hinder and prevent the offenders’ apprehension, trial, and punishment.

All in violation of Title 18, United States Code, Section 3.

COUNT 10
(Hobbs Act Robbery)

THE GRAND JURY FURTHER CHARGES:

That at all times material to this Superseding Indictment, the Sunoco Gas Station located at 210 Milacron Drive, Fountain Inn, South Carolina, was a commercial business engaged in interstate commerce.

That on or about January 13, 2020, in the District of South Carolina, the Defendant, **JOSHUA LEE SCOTT BROWN**, and others known to the grand jury, knowingly did obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the Defendant, **JOSHUA LEE SCOTT BROWN**, and others known to the grand jury, did unlawfully take and obtain property consisting of United States currency belonging to the Sunoco Gas Station from an employee of the store against her will by means of actual and threatened force, violence, and fear of injury to the employee's person, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 11

(Violent crime in aid of racketeering – Murder)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, robbery, arson, and kidnapping, in violation of the laws of South Carolina; offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments), 1512 (relating to tampering with a witness, victim, or an informant), 1513 (relating to retaliating against a witness, victim, or an informant), and 894 (relating to extortionate credit transactions).

On or about January 22, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,”** and **JOSHUA LEE SCOTT BROWN**, did murder Jeffrey Mitchell Snipes, in violation of South Carolina Code of Laws, Section 16-3-10, for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 12

(Murder committed through use of a firearm during and in relation to a crime of violence)

THE GRAND JURY FURTHER CHARGES:

On or about January 22, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,” and JOSHUA LEE SCOTT BROWN**, in the course of a violation of Title 18, United States Code, Section 924(c), to wit, the knowing and intentional carrying, use, and discharge of a firearm during and in relation to a crime of violence, as charged in Count 11, which is prosecutable in a court of the United States, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), in that the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,” and JOSHUA LEE SCOTT BROWN**, with malice aforethought, did unlawfully kill Jeffrey Mitchell Snipes willfully, deliberately, maliciously, and with premeditation, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 924(c), 924(j)(1), and 2.

COUNT 13
(Drive-by shooting)

THE GRAND JURY FURTHER CHARGES:

That on or about January 22, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,” and JOSHUA LEE SCOTT BROWN**, did unlawfully, knowingly, and with the intent to intimidate, harass, injure, and maim, fire a weapon into a group of at least two people in furtherance of a major drug offense, as defined in Title 18, United States Code, Section 36(a)(2), and in the course of such conduct, did unlawfully kill another human being with malice aforethought, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 36(b)(2)(B) and 2.

COUNT 14

(Murder committed through use of a firearm during and in relation to a crime of violence)

THE GRAND JURY FURTHER CHARGES:

On or about January 22, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,” and JOSHUA LEE SCOTT BROWN**, in the course of a violation of Title 18, United States Code, Section 924(c), to wit, the knowing and intentional carrying, use, and discharge of a firearm during and in relation to a crime of violence, as charged in Count 13, which is prosecutable in a court of the United States, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), in that the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” ARIAN GRACE JEANE, JONATHAN EUGENE MERCHANT, a/k/a “Merck,” and JOSHUA LEE SCOTT BROWN**, with malice aforethought, did unlawfully kill Jeffrey Mitchell Snipes willfully, deliberately, maliciously, and with premeditation, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 924(c), 924(j)(1), and 2.

COUNT 15

(Violent crime in aid of racketeering – Attempted assault with a dangerous weapon)

THE GRAND JURY FURTHER CHARGES:

Paragraphs 1 through 7 are re-alleged and incorporated by reference as if fully set out herein.

IGD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, robbery, arson, and kidnapping, in violation of the laws of South Carolina; offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments), 1512 (relating to tampering with a witness, victim, or an informant), 1513 (relating to retaliating against a witness, victim, or an informant), and 894 (relating to extortionate credit transactions).

On or about April 3, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” JENNIFER SORGEE, ALEX BLAKE PAYNE, and CRYSTAL NICOLE BRIGHT**, did attempt to assault J.C. and T.C. with a dangerous weapon, that is, a firearm, in violation of South Carolina Code of Laws, Section 16-3-600(C)(1)(b)(i), for the purpose of maintaining and increasing position in IGD, an enterprise engaged in racketeering activity, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 1959(a)(6) and 2.

COUNT 16

(Discharging a firearm during a crime of violence)

THE GRAND JURY FURTHER CHARGES:

On or about April 3, 2020, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” JENNIFER SORGEE, ALEX BLAKE PAYNE, and CRYSTAL NICOLE BRIGHT,** did knowingly carry and use and discharge a firearm during and in relation to a crime of violence, as charged in Count 15, which is prosecutable in a court of the United States, and did aid and abet each other in the aforesaid offense;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT 17

(Witness tampering)

THE GRAND JURY FURTHER CHARGES:

That on or about June 10, 2020, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina, the Defendant, **HEATHER HENDERSON ORRICK,** did knowingly attempt to corruptly persuade and did engage in misleading conduct toward D.R. with the intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the commission of a federal offense, to wit, the offenses alleged in Counts 5–8;

In violation of Title 18, United States Code, Section 1512(b)(3).

DRUG AND FIREARMS COUNTS

COUNT 18

(Drug Distribution Conspiracy)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around July 2017, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina and elsewhere, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” REBECCA MARTINEZ, CYNTHIA ROOKS, RICHARD FORD, AMBER HOFFMAN, SAMUEL DEXTER JUDY, BRIAN BRUCE, MONTANA BAREFOOT, JOHN JOHNSON, KELLY STILL, BENJAMIN SINGLETON, KAYLA MATTONI, ALECIA YOUNGBLOOD, CLIFFORD KYZER, KELLY JORDAN, MARK EDWARD SLUSHER, ROBERT FIGUEROA, TIFFANIE BROOKS, CRYSTAL NICOLE BRIGHT, BRITTNEY SHAE STEPHENS, ARIAN GRACE JEANE, LISA MARIE COSTELLO, AARON COREY SPROUSE, MATTHEW EDWARD CLARK, JAMES ROBERT PETERSON, a/k/a “Man Man,” EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” AARON MICHAEL CARRION, a/k/a “Cap G,” HEATHER HENDERSON ORRICK, VIRGINIA RUTH RYALL, LISA MARIE BOLTON, BRANDON LEE PHILLIPS, a/k/a “Lil B,” BILLY WAYNE RUPPE, WINDY BROOKE GEORGE, JUAN RODRIGUEZ, a/k/a “Fat Boy,” JOSHUA LEE SCOTT BROWN, JENNIFER SORGEE, ALEX BLAKE PAYNE, and SALLY WILLIAMS BURGESS, a/k/a “Cricket,” knowingly and intentionally did combine, conspire, agree, and have tacit understanding with each other and with others, both known and unknown to the grand jury, to knowingly, intentionally, and unlawfully possess with intent to distribute and distribute heroin, a Schedule I controlled substance; and methamphetamine and N-phenyl-N-[1-(2-phenylethyl)-4-**

piperidinyl] propanamide (commonly referred to as “fentanyl”), both Schedule II controlled substances.

With respect to the Defendants listed below, the amount involved in the conspiracy attributable to each as a result of the Defendant’s own conduct, and the conduct of other conspirators reasonably foreseeable to the Defendant, is:

- a. With respect to the Defendants, **REBECCA MARTINEZ, CYNTHIA ROOKS, RICHARD FORD, SAMUEL DEXTER JUDY, MONTANA BAREFOOT, KELLY STILL, CLIFFORD KYZER, KELLY JORDAN, MARK EDWARD SLUSHER, CRYSTAL NICOLE BRIGHT, BRITTNEY SHAE STEPHENS, ARIAN GRACE JEANE, LISA MARIE COSTELLO, AARON COREY SPROUSE, JAMES ROBERT PETERSON, a/k/a “Man Man,” EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” AARON MICHAEL CARRION, a/k/a “Cap G,” HEATHER HENDERSON ORRICK, BRANDON LEE PHILLIPS, a/k/a “Lil B,” BILLY WAYNE RUPPE, WINDY BROOKE GEORGE, JUAN RODRIGUEZ, a/k/a “Fat Boy,” JENNIFER SORGEE, and SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** the amount involved in the conspiracy attributable to each Defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to each, is at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- b. With respect to the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” AMBER HOFFMAN,** and **JOHN JOHNSON,** the amount involved in the conspiracy attributable to each Defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to each, is at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- c. With respect to the Defendants, **ROBERT FIGUEROA** and **TIFFANIE BROOKS,** the amount involved in the conspiracy attributable to each Defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to each, is at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a quantity of heroin, and a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- d. With respect to the Defendants, **BENJAMIN SINGLETON, ALECIA YOUNGBLOOD,** and **MATTHEW EDWARD CLARK,** the amount involved in the conspiracy attributable to each Defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to each, is at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);

- e. With respect to the Defendant, **KAYLA MATTONI**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C);
- f. With respect to the Defendant, **BRIAN BRUCE**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a quantity of heroin, and a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C);
- g. With respect to the Defendants, **VIRGINIA RUTH RYALL, LISA MARIE BOLTON, JOSHUA LEE SCOTT BROWN, and ALEX BLAKE PAYNE**, the amount involved in the conspiracy attributable to each Defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to each, is a quantity of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

All in violation of Title 21, United States Code, Section 846.

COUNT 19

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 10, 2017, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 20

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 17, 2017, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 21

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about May 15, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 22

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about May 22, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly possessed a firearm in and affecting interstate and foreign commerce, to wit, a Lorcin, model L380, .380 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 23

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 6, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 24

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about June 6, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly possessed a firearm in and affecting interstate commerce, to wit, a Ruger, model LCP, .380 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 25

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 20, 2018, in the District of South Carolina, the Defendant, **TIFFANIE BROOKS**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 26

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2018, in the District of South Carolina, the Defendants, **BENJAMIN SINGLETON** and **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 27

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, a Ruger, model SR 22, .22 caliber pistol, a Davis Industries, model P-32, .32 caliber pistol, and a Hi-Point, model JCP, .40 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 28

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2018, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, a Ruger, model SR22, .22 caliber pistol, a Davis Industries, model P-32, .32 caliber pistol, and a Hi-Point, model JCP, .40 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 29

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 21, 2018, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 30

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 11, 2018, in the District of South Carolina, the Defendants, **BENJAMIN SINGLETON** and **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 31

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about September 11, 2018, in the District of South Carolina, the Defendant, **BENJAMIN SINGLETON**, knowingly possessed a firearm, in and affecting interstate commerce, to wit, a Smith and Wesson, model SD40 VE, .40 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 32

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about September 11, 2018, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly possessed a firearm, in and affecting interstate commerce, to wit, a Smith and Wesson, model SD40 VE, .40 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 33

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 17, 2018, in the District of South Carolina, the Defendant, **KELLY JORDAN**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 34

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about October 23, 2018, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 35

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about October 25, 2018, in the District of South Carolina, the Defendant, **ALECIA YOUNGBLOOD**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 36

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about December 28, 2018, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 37

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about January 29, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 38

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about February 12, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, and another person unknown to the grand jury, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 39

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 5, 2019, in the District of South Carolina, the Defendant, **TIFFANIE BROOKS**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 40

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 6, 2019, in the District of South Carolina, the Defendant, **KELLY JORDAN**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 41

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about March 6, 2019, in the District of South Carolina, the Defendant, **KELLY JORDAN**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 40, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 42

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 6, 2019, in the District of South Carolina, the Defendant, **CLIFFORD KYZER**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 43

(Possession of a firearm in furtherance of a drug trafficking charge)

THE GRAND JURY FURTHER CHARGES:

That on or about March 6, 2019, in the District of South Carolina, the Defendant, **CLIFFORD KYZER**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 42, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 44

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 25, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 45

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about April 1, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 46

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about April 22, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 47

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about April 22, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 48

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about April 22, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 49

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about April 24, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 50

(Possession with intent to distribute at least 500 grams of methamphetamine and a quantity of heroin and fentanyl)

THE GRAND JURY FURTHER CHARGES:

That on or about May 23, 2019, in the District of South Carolina, the Defendants, **ROBERT FIGUEROA** and **TIFFANIE BROOKS**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a quantity of heroin, a Schedule I controlled substance, and a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C).

COUNT 51

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about May 23, 2019, in the District of South Carolina, the Defendant, **ROBERT FIGUEROA**, knowingly possessed firearms in and affecting interstate and foreign commerce, to wit, a Smith and Wesson, model SD40 VE, .40 caliber pistol, a Sig Sauer, model P220, .45 caliber pistol, and a Sig Sauer, model Mosquito, .22 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 52

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about May 23, 2019, in the District of South Carolina, the Defendant, **ROBERT FIGUEROA**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 50, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 53

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about May 23, 2019, in the District of South Carolina, the Defendant, **TIFFANIE BROOKS**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 50, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 54

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about May 28, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 55

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about May 30, 2019, in the District of South Carolina, the Defendant, **WINDY BROOKE GEORGE**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 56

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about May 31, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 57

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about May 31, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly possessed a firearm and ammunition, in and affecting interstate commerce, to wit, a Hi-Point 9mm rifle, 9mm ammunition, and .22 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 58

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about May 31, 2019, in the District of South Carolina, the Defendant, **MARK SLUSHER**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 56, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 59

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 3, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 60

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about June 3, 2019, in the District of South Carolina, the Defendant, **MARK EDWARD SLUSHER**, knowingly possessed a firearm and ammunition, each in and affecting interstate commerce, to wit, a Hi-Point, model JHP, .45 caliber pistol and .45 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 61

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 11, 2019, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 62

(Felon in possession of firearms and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about June 11, 2019, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly possessed firearms and ammunition, in and affecting interstate and foreign commerce, to wit, a Smith and Wesson, model Clerke 1st, .32 caliber revolver, a Smith and Wesson, model 5906, 9mm pistol, a Phoenix Arms, model HP22A, .22 caliber pistol, 9mm ammunition, .22 caliber ammunition, and .223 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 63

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about June 11, 2019, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 61, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 64

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 13, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,”** and **BRIAN BRUCE,** knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 65

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 13, 2019, in the District of South Carolina, the Defendant, **AMBER HOFFMAN**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 66

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2019, in the District of South Carolina, the Defendant, **JENNIFER SORGEE**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 67

(Felony in possession of firearms and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2019, in the District of South Carolina, the Defendant, **JENNIFER SORGEE**, knowingly possessed firearms and ammunition, in and affecting interstate and foreign commerce, to wit, a SCCY 9mm pistol, a Walther .22 caliber pistol, 9mm ammunition, and .22 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 68

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about June 14, 2019, in the District of South Carolina, the Defendant, **JENNIFER SORGEE**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 66, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 69

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendant, **AMBER HOFFMAN**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 70

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendant, **AMBER HOFFMAN**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 69, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 71

(Distribution of a quantity of heroin)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” AMBER HOFFMAN, and JOHN JOHNSON,** knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of heroin, a Schedule I controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 72

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendant, **MATTHEW J. WARD, a/k/a “Bones,”** knowingly possessed a firearm, in and affecting interstate and foreign commerce, to wit, a Taurus .357 caliber revolver, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 73

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendant, **SAMUEL DEXTER JUDY**, knowingly possessed a firearm, in and affecting interstate and foreign commerce, to wit, a Taurus .357 caliber revolver, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 74

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2019, in the District of South Carolina, the Defendant, **AMBER HOFFMAN**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 71, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 75

(Felony in possession of firearms and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about July 2, 2019, in the District of South Carolina, the Defendant, **JOHN JOHNSON**, knowingly possessed firearms and ammunition, in and affecting interstate and foreign commerce, to wit, a Del-Ton Inc., model DTI-15, 5.56mm rifle, a Taurus, model TCP, .380 caliber pistol, a Bauer Firearms Corporation .25 caliber pistol, .380 caliber ammunition, .25 caliber ammunition, and .223 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 76

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 3, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a "Bones,"** and **SAMUEL DEXTER JUDY**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 77

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 5, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 78

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 7, 2019, in the District of South Carolina, the Defendant, **WINDY BROOKE GEORGE**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 79

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about July 7, 2019, in the District of South Carolina, the Defendant, **WINDY BROOKE GEORGE**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 78, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 80

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about July 9, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, a Lorcin .25 caliber pistol, a Taurus, model PT111GS Millennium, 9mm pistol, and a Smith and Wesson, model M&P15, 5.56 caliber rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 81

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 9, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 82

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 11, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 83

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 15, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 84

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 15, 2019, in the District of South Carolina, the Defendants, **BRIAN BRUCE** and **MONTANA BAREFOOT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 85

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 16, 2019, in the District of South Carolina, the Defendant, **BRIAN BRUCE**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 86

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 19, 2019, in the District of South Carolina, the Defendant, **REBECCA MARTINEZ**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 87

(Discharging a firearm during and in relation to a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about July 20, 2019, in the District of South Carolina, the Defendants, **AARON COREY SPROUSE** and **VIRGINIA RUTH RYALL**, knowingly used, carried, and discharged a firearm during and in relation to a drug trafficking crime, as charged in Count 18, which is prosecutable in a court of the United States, and did aid and abet each other in the aforesaid offense;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT 88

(Murder committed by use of a firearm during and in relation to a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about July 20, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE** in the course of a violation of Title 18, United States Code, Section 924(c), to wit, the knowing and intentional carrying, use, and discharge of a firearm during and in relation to a drug trafficking crime, as charged in Count 18, which is prosecutable in a court of the United States, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), in that the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,”** and **AARON COREY SPROUSE**, with malice aforethought, did unlawfully kill Michelle Dodge willfully, deliberately, maliciously, and with premeditation, and did aid and abet each other in the aforesaid offense.

All in violation of Title 18, United States Code, Sections 924(c), 924(j)(1), and 2.

COUNT 89

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 22, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,”** and **REBECCA MARTINEZ**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 90

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 24, 2019, in the District of South Carolina, the Defendant, **REBECCA MARTINEZ**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 91

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **LISA MARIE COSTELLO**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 92*(Conspiracy to commit money laundering)***THE GRAND JURY FURTHER CHARGES:**

That from in or about February 2019, through approximately July 25, 2019, in the District of South Carolina, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,”** and **LISA MARIE COSTELLO**, were engaged in a methamphetamine distribution conspiracy in violation of Title 21, United States Code, Sections 841 and 846.

As part of this conspiracy, Defendant **JAMES ROBERT PETERSON, a/k/a “Man Man,”** would arrange for Defendant, **LISA MARIE COSTELLO**, to possess kilogram quantities of methamphetamine. Defendant, **JAMES ROBERT PETERSON, a/k/a “Man Man,”** would further arrange for Defendant, **LISA MARIE COSTELLO**, to sell quantities of the methamphetamine to various buyers. As Defendant, **LISA MARIE COSTELLO**, would acquire United States currency in exchange for the sale of methamphetamine, Defendant, **JAMES ROBERT PETERSON, a/k/a “Man Man,”** would instruct Defendant, **LISA MARIE COSTELLO**, to transfer money to different people using money transfer applications and facilities such as JPay, Green Dot, Walmart2Walmart, and Walmart MoneyCard.

During the relevant time period, in the District of South Carolina, Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,”** and **LISA MARIE COSTELLO**, knowingly and willfully did combine, conspire, agree and have tacit understanding with others, both known and unknown to the grand jury,

- (a) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of a specified unlawful activity, that is drug trafficking in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the property involved in the financial

transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were intended to promote the carrying on of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

- (b) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of a specified unlawful activity, that is drug trafficking in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the property, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 93

(Maintaining a drug-involved premises)

THE GRAND JURY FURTHER CHARGES:

That from in or about February 2019, through on or about July 25, 2019, in the District of South Carolina, the Defendant, **LISA MARIE COSTELLO**, did knowingly rent, use, and maintain a place, that is, a residence located at 155 Brights Road, Gaffney, South Carolina, for the purpose of unlawfully storing and distributing controlled substances, that is, a quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNT 94

(Possession with intent to distribute 50 grams or more of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about July 31, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 95

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about July 31, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** knowingly possessed a firearm, in and affecting interstate commerce, to wit, a Smith and Wesson 9mm pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 96

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about July 31, 2019, in the District of South Carolina, the Defendant, **AARON MICHAEL CARRION, a/k/a “Cap G,”** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 94, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 97

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 5, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,”** and **CYNTHIA ROOKS**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 98

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about August 7, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly possessed a firearm and ammunition, in and affecting interstate commerce, to wit, a Smith and Wesson .380 caliber pistol and .380 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 99

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 12, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 100

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 12, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,”** and **RICHARD FORD**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 101

(Distribution of a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 15, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 102

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 19, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” CYNTHIA ROOKS,** and **RICHARD FORD,** knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 103

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about August 19, 2019, in the District of South Carolina, the Defendant, **MATTHEW J. WARD, a/k/a “Bones,”** knowingly possessed a firearm, in and affecting interstate and foreign commerce, to wit, an Interarms, model AKM47 SA, 7.62x33mm rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 104

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about August 19, 2019, in the District of South Carolina, the Defendant, **CYNTHIA ROOKS**, knowingly possessed a firearm, in and affecting interstate and foreign commerce, to wit, an Interarms, model AKM47 SA, 7.62x33mm rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 105

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about August 19, 2019, in the District of South Carolina, the Defendant, **RICHARD FORD**, knowingly possessed a firearm in and affecting interstate and foreign commerce, to wit, an Interarms, model AKM47 SA, 7.62x33mm rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 106

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about August 20, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, an American Arms, model CX 22, .22 caliber pistol and a H&R Inc., model 949, .22 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 107

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendant, **SAMUEL DEXTER JUDY**, knowingly possessed a firearm and ammunition, in and affecting interstate and foreign commerce, to wit, a Taurus .38 caliber revolver, .38 caliber ammunition, and 7.62mm ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 108

(Distribution of at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” CYNTHIA ROOKS, and RICHARD FORD,** knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 109

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendant, **MATTHEW J. WARD, a/k/a “Bones,”** knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, an Eagle Arms, model Eagle-15, .223 caliber rifle, a Springfield, model M1A1, rifle, and a Remington, model 783, .223 caliber rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 110

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendant, **CYNTHIA ROOKS**, knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, a Derringer Cobra, model CB38, .38 caliber pistol, an Eagle Arms, model Eagle-15, .223 caliber rifle, a Springfield, model M1A1, rifle, and a Remington, model 783, .223 caliber rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 111

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendant, **CYNTHIA ROOKS**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 108, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 112

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about August 22, 2019, in the District of South Carolina, the Defendant, **RICHARD FORD**, knowingly possessed firearms in and affecting interstate and foreign commerce, to wit, an Eagle Arms, model Eagle-15, .223 caliber rifle, a Springfield, model M1A1, rifle, and a Remington, model 783, .223 caliber rifle, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 113

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 28, 2019, in the District of South Carolina, the Defendant, **SAMUEL DEXTER JUDY**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 114

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about August 28, 2019, in the District of South Carolina, the Defendant, **SAMUEL DEXTER JUDY**, knowingly possessed a firearm, in and affecting interstate and foreign commerce, to wit, a Heritage .22 caliber revolver, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 115

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about August 28, 2019, in the District of South Carolina, the Defendant, **SAMUEL DEXTER JUDY**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 113, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 116

(Distribution of at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about August 29, 2019, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 117

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 4, 2019, in the District of South Carolina, the Defendants, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,”** and **BRITTNEY SHAE STEPHENS,** knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 118

(Felon in possession of firearms)

THE GRAND JURY FURTHER CHARGES:

That on or about September 4, 2019, in the District of South Carolina, the Defendant, **EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,”** knowingly possessed firearms, in and affecting interstate and foreign commerce, to wit, a Palmetto State Armory, model PA-15, multi-caliber rifle, a Remington, model 742, 30-06 caliber rifle, a SCCY, model CPX-2, 9mm pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 119

(Distribution of a quantity of heroin)

THE GRAND JURY FURTHER CHARGES:

That on or about September 25, 2019, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 120

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 25, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 121

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES:

That on or about September 25, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly possessed a firearm in and affecting interstate and foreign commerce, to wit, a Jimenez Arms .22 caliber pistol, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 122

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about September 25, 2019, in the District of South Carolina, the Defendant, **MONTANA BAREFOOT**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 120, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 123

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendants, **JOHN JOHNSON** and **KELLY STILL**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other in the aforesaid offense;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 124

(Possession of heroin and marijuana)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendant, **JOHN JOHNSON**, knowingly, intentionally, and unlawfully did possess a quantity of heroin and marijuana, both Schedule I controlled substances;

In violation of Title 21, United States Code, Section 844(a).

COUNT 125

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendant, **JOHN JOHNSON**, knowingly possessed a firearm and ammunition, in and affecting interstate and foreign commerce, to wit, a Smith and Wesson, model M&P Shield, .40 caliber pistol, .40 caliber ammunition, .38 caliber ammunition, .22 caliber ammunition, and 9mm ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 126

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendant, **JOHN JOHNSON**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 123, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 127

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendant, **KELLY STILL**, knowingly possessed a firearm and ammunition, in and affecting interstate and foreign commerce, to wit, a Smith and Wesson, model M&P Shield, .40 caliber pistol, .40 caliber ammunition, .38 caliber ammunition, .22 caliber ammunition, and 9mm ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 128

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about November 20, 2019, in the District of South Carolina, the Defendant, **KELLY STILL**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 123, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 129

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about December 12, 2019, in the District of South Carolina, the Defendant, **MATTHEW EDWARD CLARK**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 130

(Distribution of a quantity of heroin and fentanyl)

THE GRAND JURY FURTHER CHARGES:

That on or about January 7, 2020, in the District of South Carolina, the Defendant, **BRIAN BRUCE**, knowingly, intentionally, and unlawfully did possess with intent to distribute and distribute a quantity of heroin, a Schedule I controlled substance, and a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 131

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about January 27, 2020, in the District of South Carolina, the Defendant, **JOSHUA LEE SCOTT BROWN**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 132

(Possession with intent to distribute at least 500 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about February 4, 2020, in the District of South Carolina, the Defendant, **ARIAN GRACE JEANE**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 133

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about February 9, 2020, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 134

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about February 9, 2020, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly possessed a firearm and ammunition, in and affecting interstate and foreign commerce, to wit, a Bersa, model Thunder, .380 caliber pistol and .380 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 135

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about February 9, 2020, in the District of South Carolina, the Defendant, **SALLY WILLIAMS BURGESS, a/k/a “Cricket,”** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 133, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 136

(Felon in possession of a firearm and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about February 11, 2020, in the District of South Carolina, the Defendant, **KAYLA MATTONI,** knowingly possessed a firearm and ammunition, in and affecting interstate commerce, to wit, a Smith and Wesson, model Bodyguard, .380 caliber pistol, and .380 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 137

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about February 17, 2020, in the District of South Carolina, the Defendant, **KELLY STILL,** knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 138

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 11, 2020, in the District of South Carolina, the Defendant, **KAYLA MATTONI**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 139

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about March 30, 2020, in the District of South Carolina, the Defendant, **CRYSTAL NICOLE BRIGHT**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 140

(Felon in possession of firearms and ammunition)

THE GRAND JURY FURTHER CHARGES:

That on or about April 15, 2020, in the District of South Carolina, the Defendant, **ALEX BLAKE PAYNE**, knowingly possessed firearms and ammunition, in and affecting interstate and foreign commerce, to wit, a Hi-Point, model JHP, .45 caliber pistol, an Armi Tanfoglio, model GT27, .25 caliber pistol, .45 caliber ammunition, and .22 caliber ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 141

(Possession of methamphetamine and fentanyl)

THE GRAND JURY FURTHER CHARGES:

That on or about April 15, 2020, in the District of South Carolina, the Defendant, **ALEX BLAKE PAYNE**, knowingly, intentionally, and unlawfully did possess a quantity of methamphetamine and a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), both Schedule II controlled substances;

In violation of Title 21, United States Code, Section 844(a).

COUNT 142

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 9, 2020, in the District of South Carolina, the Defendant, **ALECIA YOUNGBLOOD**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 143

(Possession with intent to distribute at least 50 grams of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 11, 2020, in the District of South Carolina, the Defendant, **KELLY JORDAN**, knowingly, intentionally, and unlawfully did possess with intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 144

(Possession of a firearm in furtherance of a drug trafficking crime)

THE GRAND JURY FURTHER CHARGES:

That on or about September 11, 2020, in the District of South Carolina, the Defendant, **KELLY JORDAN**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as charged in Count 143, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 145

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 16, 2020, in the District of South Carolina, the Defendant, **ALECIA YOUNGBLOOD**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 146

(Possession with intent to distribute a quantity of methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 16, 2020, in the District of South Carolina, the Defendant, **KELLY STILL**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 147

(Possession with intent to distribute a quantity of heroin and methamphetamine)

THE GRAND JURY FURTHER CHARGES:

That on or about September 16, 2020, in the District of South Carolina, the Defendant, **JOHN JOHNSON**, knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, and a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE**DRUG/FIREARM OFFENSES:**

Upon conviction for a violation of Title 18 and Title 21, United States Code as charged in this Superseding Indictment, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” REBECCA MARTINEZ, CYNTHIA ROOKS, RICHARD FORD, AMBER HOFFMAN, SAMUEL DEXTER JUDY, BRIAN BRUCE, MONTANA BAREFOOT, JOHN JOHNSON, KELLY STILL, BENJAMIN SINGLETON, KAYLA MATTONI, ALECIA YOUNGBLOOD, CLIFFORD KYZER, KELLY JORDAN, MARK EDWARD SLUSHER, ROBERT FIGUEROA, TIFFANIE BROOKS, CRYSTAL NICOLE BRIGHT, BRITTNEY SHAE STEPHENS, ARIAN GRACE JEANE, LISA MARIE COSTELLO, AARON COREY SPROUSE, MATTHEW EDWARD CLARK, JAMES ROBERT PETERSON, a/k/a “Man Man,” EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” AARON MICHAEL CARRION, a/k/a “Cap G,” HEATHER HENDERSON ORRICK, VIRGINIA RUTH RYALL, LISA MARIE BOLTON, BRANDON LEE PHILLIPS, a/k/a “Lil B,” BILLY WAYNE RUPPE, WINDY BROOKE GEORGE, JUAN RODRIGUEZ, a/k/a “Fat Boy,” JONATHAN EUGENE MERCHANT, a/k/a “Merck,” JOSHUA LEE SCOTT BROWN, JENNIFER SORGEE, ALEX BLAKE PAYNE, and SALLY WILLIAMS BURGESS, a/k/a “Cricket,” shall forfeit to the United States all of the Defendants’ right, title and interest in and to any property, real and personal,**

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) -

- (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
- (2) involved in or used in any knowing violations of 18 U.S.C. §§ 922 or 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

KIDNAPPING/WITNESS TAMPERING/ROBBERY:

Upon conviction for a violation of Title 18, United States Code, Sections 1201, 1512, and 1951, as charged in this Superseding Indictment, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,” AARON MICHAEL CARRION, a/k/a “Cap G,” AARON COREY SPROUSE, CATHERINE AMANDA ROSS, VIRGINIA RUTH RYALL, LISA MARIE BOLTON, HEATHER HENDERSON ORRICK, and JOSHUA LEE SCOTT BROWN,** shall forfeit to the United States any property, real or personal, constituting, derived from, or traceable to, proceeds the Defendants obtained directly or indirectly as a result of such offenses.

MONEY LAUNDERING:

Upon conviction for violation of Title 18, United States Code, Section 1956, as charged in this Superseding Indictment, the Defendants, **JAMES ROBERT PETERSON, a/k/a “Man Man,”** and **LISA MARIE COSTELLO,** shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, as charged in the Superseding Indictment, or any property traceable to the offenses.

RACKETEERING:

Upon conviction for violation of Title 18, United States Code, Section 1962, as charged in this Superseding Indictment, the Defendants, **MATTHEW J. WARD, a/k/a “Bones,” CYNTHIA ROOKS, AMBER HOFFMAN, CLIFFORD KYZER, CRYSTAL NICOLE BRIGHT, ARIAN GRACE JEANE, LISA MARIE COSTELLO, AARON COREY**

SPROUSE, JAMES ROBERT PETERSON, a/k/a “Man Man,” EDWARD GARY AKRIDGE, a/k/a “G9,” a/k/a “G9 the Don,” a/k/a “Eddie Boss,” AARON MICHAEL CARRION, a/k/a “Cap G,” HEATHER HENDERSON ORRICK, VIRGINIA RUTH RYALL, LISA MARIE BOLTON, JENNIFER SORGEE, ALEX BLAKE PAYNE, and SALLY WILLIAMS BURGESS, a/k/a “Cricket,” shall forfeit to the United States the following property:

- (1) Any interest acquired or maintained in violation of Section 1962, which interests are subject to forfeiture to the United State pursuant to Title 18, United States Code, Section 1963(a)(1);
- (2) Any interest in, security of, claim against, or property or contractual rights of any kind affording a source of influence over the Enterprise described in Count 1 which was established, operated, controlled, conducted and or participated in the conduct of, in violation of Section 1962; which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and
- (3) Any property constituting or derived from proceeds obtained directly and indirectly from racketeering activity in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3);

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), 982(a)(1), 1963(a)(1), and 1963(a)(3), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

(a) Firearms:

- (1) Derringer Cobra CB38 .38 caliber pistol
(Serial Number: CT219906)
- (2) Stevens, model 320, 12-gauge shotgun
(Serial Number: 185615)

- (3) Stevens 95 12-gauge shotgun
(Serial Number: B4399)
- (4) Mossberg, model 500, 12-gauge shotgun
(Serial Number: V0496768)
- (5) Beretta 22LR .22 caliber rifle
(Serial Number: PB023615)
- (6) Eagle Arms Eagle-15 .223 caliber rifle
(Serial Number: M22-23963)
- (7) Springfield M1A1 M1 caliber rifle
(Serial Number: 280817)
- (8) Remington 783 .308 caliber rifle
(Serial Number: RA13711B)
- (9) Palmetto Armory PA-15 .223 caliber rifle
(Serial Number: SCD004718)
- (10) Black in color 7.62x39mm AK-47 type rifle
(Serial Number: CC8607)
- (11) Heritage .22 caliber revolver
(Serial Number: L01053)
- (12) Charter Arms Explorer II pistol
(Serial Number: unknown)
- (13) Jimenez Arms .22 caliber pistol
(Serial Number: unknown)
- (14) Smith and Wesson, model Bodyguard, .380 caliber pistol
(Serial Number: EBN3136)
- (15) American Arms Cx 22 .22 caliber pistol
(Serial Number: 003179)
- (16) H&R Inc. 929 .22 caliber pistol
(Serial Number: BB012041)
- (17) Smith and Wesson, model M&P Shield, .40 caliber pistol
(Serial Number: HWK9459)
- (18) Davis Industries P-32 .32 caliber pistol
(Serial Number: obliterated)

- (19) Remington, model 1100, shotgun
(Serial Number: L327526V)
- (20) Winchester .22 caliber rifle
(Serial Number: B1312321)
- (21) Browning .22 caliber rifle
(Serial Number: none)
- (22) Winchester, model 1906, .22 caliber rifle
(Serial Number: 35984)
- (23) Diamondback Arms AR-15
(Serial Number: DB1834975)
- (24) Marlin .22 caliber rifle
(Serial Number: 09356023)
- (25) Sauer western six-shooter
(Serial Number: A17186)
- (26) Ruger sr22 pistol
(Serial Number: 36786421)
- (27) Glock, model 22, .40 caliber pistol
(Serial Number: DFL012US)
- (28) Taurus, model 709 slim, .380 caliber pistol
(Serial Number: TKN00070)
- (29) Taurus, model PT111 G2, 9mm pistol with a laser attachment
(Serial Number: TIP19194)
- (30) Hi-Point rifle
(Serial Number: E38282)
- (31) Smith and Wesson, model SD40 VE, .40 caliber pistol
(Serial Number: FZP7580)
- (32) Sig Sauer, model P220, .45 caliber pistol
(Serial Number: G267870)
- (33) Sig Sauer, model Mosquito, .22 caliber pistol
(Serial Number: F108304)
- (36) Winchester, model 94, .32 caliber rifle
Serial Number: 947800

- (37) Unknown Manufacturer machine gun, model unknown
Serial Number: Obliterated
- (38) Taurus, model 85 Ultralite, .38 caliber pistol
Serial Number: D012904
- (39) Taurus, model TCP, .380 caliber pistol
Serial Number: 1D100244
- (40) Taurus, model TCP, .380 caliber pistol
Serial Number: 58813C
- (41) Bauer Firearms Corporation .25 caliber automatic pistol
Serial Number: 063575
- (42) Sawed off Shotgun, model unknown
Serial Number: None
- (43) Del-Ton Inc., model DTI-15, 5.56 caliber rifle
Serial Number: DTIS172228
- (44) Taurus, model TCP, .380 caliber pistol
Serial Number: 22819D
- (45) Jimenez Arms .22 caliber pistol
Serial Number: 1282760
- (46) Smith and Wesson, model Bodyguard, .380 caliber pistol
Serial Number: KEF8959
- (47) SCCY 9mm pistol
Serial Number: 317775
- (48) Walther .22 caliber pistol
Serial Number: WF036576
- (49) Hi-Point, model JHP, .45 caliber pistol
Serial Number: X4344352
- (50) Armi Tanfoglio, model GT27, .25 caliber pistol
Serial Number: M98636
- (51) Smith and Wesson, model Clerke 1st, .32 caliber revolver
Serial Number: 063963
- (52) Smith and Wesson, model 5906, 9mm pistol
Serial Number: THF4846

- (53) Phoenix Arms, model HP22A, .22 caliber pistol
Serial Number: 4396650
- (54) Bersa, model Thunder, .380 caliber pistol
Serial Number: 899434
- (55) Lorcin .25 caliber pistol
Serial Number: 008274
- (56) Taurus, PT111GS Millenium, 9mm pistol
Serial Number: TKT68512
- (57) Smith and Wesson, M&P15, 5.56 caliber rifle
Serial Number: SY52836
- (58) Palmetto State Armory, model PA-15, multi-caliber rifle
Serial Number: LW334148
- (59) Remington, model 742, 30-06 caliber rifle
Serial Number: 7324200
- (60) SCCY, model CPX-2, 9mm pistol
Serial Number: 194982

(b) Ammunition:

Miscellaneous rounds of 9mm, 12-gauge, .22 caliber, .25 caliber, .38 caliber, .40 caliber, .45 caliber, .223 caliber, .380 caliber, 5.56mm, and 7.62 mm ammunition

(c) Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto as a result of their violation of Title 18 and Title 21.

(d) Money Laundering/Forfeiture Judgment:

A sum of money equal to all property involved in the money laundering offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto, for which the Defendants are liable as the result of their violation of 18 U.S.C. § 1956.

(e) Cash/United States Currency:

- (1) \$2,520.00 seized from Clifford Kyzer
- (2) \$2,900.00 seized from Robert Figueroa

- (3) \$5,249.00 seized from Robert Figueroa
- (4) \$12,560.00 seized from Kelly Jordan

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of Defendants up to an amount equivalent to the value of the above-described forfeitable property.

This is pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), 982(a)(1), 1963(a)(1), and 1963(a)(3), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

REDACTED
FOURPERSON

PETER M. MCCOY, JR. (jwh/bbh/lkm/crs)
UNITED STATES ATTORNEY

RECEIVED
USDC CLERK, GREENVILLE, SC
2020 DEC -9 AM 9:25

RECORD OF GRAND JURY BALLOT

C/ 6:20cr628

THE UNITED STATES OF AMERICA v. MATTHEW J. WARD, a/k/a "Bones", ET AL.

(SEALED UNTIL FURTHER ORDER OF THE COURT)